

REMARKS

The Final Office Action dated December 21, 2006 has been reviewed and these remarks are responsive thereto. Claims 1–26, 35, 36, and 43–48 have been amended. Claims 27–34 and 37–42 have been canceled. New claims 49–58 have been added. No new matter has been added. Claims 1–26, 35, 36, and 43–58 are pending.

Rejection under 35 U.S.C. 112, second paragraph

Claims 1, 7–12, and 17 were rejected under 35 U.S.C. 112, second paragraph as being indefinite. Claims 1, 7–12 and 17 have been amended. Withdrawal of the rejection is respectfully requested.

Rejection under 35 U.S.C. 101

Claims 1–4, 7–17, 35, 38, 39 and 41 were rejected under 35 U.S.C. 101 as being directed to non–statutory subject matter. Claims 1–4, 7–17, and 35 have been amended as suggested by the examiner. Claims 38, 29, and 41 have been canceled. Withdrawal of the rejection is respectfully requested.

Rejection under 35 U.S.C. 102

Claims 37 and 43–48 were rejected under 35 U.S.C. 102(e) as being anticipated by Mellen–Garnett (U.S. Patent Publication No. 2003/0093479). This rejection is respectfully traversed.

Regarding claim 43, the Office Action asserts that “Mellon–Garnett discloses the storage of data [at paragraphs 0046 and 0047], which is all that the limitations disclose without further detailing positively reciting functionality.” See Office Action, page 36. Applicants respectfully point out that claim 43 recites more than merely the “storage of

Type of Response: Amendment
Application Number: 10/786,674
Attorney Docket Number: 305378.01
Filing Date: February 25, 2004

data”. However, to expedite prosecution, claim 43, as amended, recites an action identifier, a source identifier, a related action identifier, and a source identifier. Claim 43, as amended, further recites specific functionality for each element. Mellon–Garnett discloses at paragraphs 0046 and 0047 a service providing publish and subscribe notification in which an application requests to subscribe to an event. The subscription request is stored on a list (the subscription list 402) and when the event occurs, an object associated with the event is delivered to the application that requested subscription to the event. Clearly, this is unrelated to an action identifier, a source identifier, a related action identifier, a source identifier, or the corresponding functionalities as recited in claim 43.

Withdrawal of the rejection of claim 43 is respectfully requested.

Claims 44–48 depend from claim 43 and are allowable for at least the reasons set forth above for claim 43. Claim 37 has been canceled. Therefore, withdrawal of the rejection of claims 44–48 and 37 is respectfully requested.

Rejection under 35 U.S.C. 103(a)

Claims 1, 4–8, 14–18, 21–25, 31–33, 35, 36, and 38–42 were rejected under 35 U.S.C. 103(a) as being unpatentable over Mellen–Garnett in view of Choudhary (A general Multi–User Undo/Redo Model, Proceedings of the Fourth European Conference of Computer–Supported Cooperative Work – ECSCW 95, Sept. 11–15, 1995, p. 231–246). This rejection is respectfully traversed.

Claim 1, as amended, recites recording action information pertaining to a first action executed in a first computer application, identifying a cross–source relationship between the first action and a second action executed in a second computer application, executing a first action management operation on the first action, and responsive to executing the first action management operation, executing a second action

Type of Response: Amendment
Application Number: 10/786,674
Attorney Docket Number: 305378.01
Filing Date: February 25, 2004

management operation on the second action based on the identified relationship. Claim 1, as amended, also recites that the first computer application is a different computer application from the second computer application.

Contrary to the Office Action's assertion, the combination of Mellon-Garnett at paragraphs [0034], [0041], [0043] and Choudhary ("Basic Multi-User Undo/Redo" section) fails to teach or suggest claim 1.

Mellon-Garnett discloses a method in which a module provides interoperability of applications (paragraph [0034]). Data is received from a first application at the module. The module then converts the received data from the first application into an alternate format for a second application. The conversion involves the module executing an "associated business inter-operability function" and generating "an object for transmission to the second (application)" (paragraph [0035]). Thus, the converted data is output to the second application (paragraph [0034]).

First, Mellon-Garnett fails to teach or suggest recording action information pertaining to a first action executed in a first application. Rather, Mellon-Garnett merely discloses receiving data from a first application, then converting the data into an alternate format for a second application. Aside from transmitting the original data, the first application of Mellon-Garnett is not disclosed as executing an action at all. Assuming the Office Action is equating transmitting the original data to be converted to the alternate form as the "first action", Mellon-Garnett fails to teach or suggest recording action information pertaining to the transmission of the data from the first application.

Nor does Mellon-Garnett teach or suggest identifying a cross-source relationship between the first action and a second action executed in a second computer application. Rather, Mellon-Garnett merely discloses receiving data from one application and translating/converting the data to another format for another application. Assuming

Type of Response: Amendment
Application Number: 10/786,674
Attorney Docket Number: 305378.01
Filing Date: February 25, 2004

the Office Action equates the transmission of data from the first application to the module as the “first action,” Mellon–Garnett still fails to teach or suggest identifying a cross–source relationship between the transmission of data from the first application to an action executed in the second application. In fact, aside from receiving the converted data, Mellon–Garnett fails to teach or suggest the second application performing any action at all. Assuming the Office Action equates receiving converted data as the “second action”, Mellon–Garnett still fails to teach or suggest identifying a cross–source relationship between the first application transmitting data and the second application receiving data.

Mellon–Garnett also fails to teach or suggest executing a first action management operation on the first action. Assuming the Office Action equates transmitting data to the module as the “first action” executed by the first application, Mellon–Garnett still fails to teach or suggest executing an operation (i.e., a first action management operation) on the transmission of data to the module. In fact, Mellon–Garnett fails to teach or suggest such an operation at all.

The Office Action admits that Mellon–Garnett fails to teach or suggest executing a second operation on an action of the second application responsive to the execution of the first operation on the action of the first application. The Office Action relies on Choudhary to make up for the deficits of Mellon–Garnett. However, contrary to the Office Action’s assertion, Choudhary fails to cure the deficits of Mellon–Garnett.

Choudhary discloses multi–user undo/redo. Choudhary discloses a multi–user editing session in a single application (i.e., “Suite”). See Choudhary, page 236, “Basic Multi–User Undo/Redo”. In this model, a first user (“rxc”) and a second user (“pd”) are accessing and editing a single document (budget document) in a single application (the “Suite” application). User “rxc” enters data into the budget document and the entered data appears on the displays of both user “rxc” and user “pd”. User “pd” performs an

Type of Response: Amendment
Application Number: 10/786,674
Attorney Docket Number: 305378.01
Filing Date: February 25, 2004

“undo” of the action taken by “rxc” and the data reverts back to the original form on the displays of both “rxc” and “pd”. As can be seen, the whole point of the Choudhary model is that multiple users editing a single document may work together such that changes made by one user are immediately seen by other users who are simultaneously editing the document.

Thus, Choudhary fails to teach or suggest executing an operation on an action of a second application responsive to the execution of an operation on an action of the first application because Choudhary fails to teach a first and second application. Instead, in Choudhary, only one application is used. Claim 1, as amended, recites that the first computer application is a different computer application from the second computer application. Choudhary discloses the exact opposite in which only one application (i.e., “Suite”) is used by multiple users.

Indeed, in Choudhary, the most important point is that multiple users edit a single document such that changes made in the document by one user is provided to all users in real-time who are editing the document. In order to provide such a real-time multi-user scenario, it would be necessary to have all users working in the same application because if users were working in different applications and documents, changes in one document might not be relevant to changes in an unrelated document. In other words, having multiple applications would be contrary to the purpose of the Choudhary model.

Therefore, it is respectfully submitted that the rejection of claim 1 is improper and should be withdrawn.

Claims 18, 35, and 36, as amended, are similar to claim 1 and are allowable for at least the reasons set forth above for claim 1.

Claims 4–8, 14–17, 21–25, 31–33, and 38–42 depend from claim 1, 18, 35, or 36 and are allowable for at least the reasons set forth above for claim 1, 18, 35, or 36.

Type of Response: Amendment
Application Number: 10/786,674
Attorney Docket Number: 305378.01
Filing Date: February 25, 2004

Therefore, withdrawal of the rejection of claims 4-8, 14-17, 21-25, 31-33, and 38-42 is respectfully requested.

Claims 2, 3, 9-13, 19, 20, 26-30 and 34 were rejected under 35 U.S.C. 103(a) as being unpatentable over Mellen-Garnett and Choudhary in view of Myers ("The Case for an Open Data Model", August 1998). This rejection is respectfully traversed.

Claims 2, 3, 9-13, 19, 20, 26-30 and 34 depend from claim 1 or 18. As set forth above, Mellen-Garnett and Choudhary fail to teach or suggest claim 1 or 18. Myers fails to cure the deficits of Mellen-Garnett and Choudhary with respect to claim 1 or claim 18. Nor does the Office Action assert that Meyers does.

Withdrawal of the rejection of claims 2, 3, 9-13, 19, 20, 26-30 and 34 is respectfully requested.

New claims 49-58 depend from claim 1 and are allowable for at least the reasons set forth above for claim 1.

CONCLUSION

Accordingly, in view of the above amendment and remarks it is submitted that the claims are patentably distinct over the prior art and that all the rejections to the claims have been overcome. Reconsideration and reexamination of the above Application is requested. Based on the foregoing, Applicants respectfully requests that the pending claims be allowed, and that a timely Notice of Allowance be issued in this case. If the Examiner believes, after this amendment, that the application is not in condition for allowance, the Examiner is requested to call the Applicant's attorney at the telephone number listed below.

Type of Response: Amendment
Application Number: 10/786,674
Attorney Docket Number: 305378.01
Filing Date: February 25, 2004

If this response is not considered timely filed and if a request for an extension of time is otherwise absent, Applicants hereby request any necessary extension of time. If there is a fee occasioned by this response, including an extension fee that is not covered by an enclosed check please charge any deficiency to Deposit Account No. 50-0463.

Respectfully submitted,

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Date: January 18, 2007

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Type of Response: Amendment
Application Number: 10/786,674
Attorney Docket Number: 305378.01
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